Remarks

For the convenience of the Examiner, Applicant responds to the office Action in the order in which the objections and rejections were given.

In the Specification:

Claim 28 and 29 stand objected to because of grammatical errors. The above-amendments to claims 28 and 29 correct the informalities noted by the Examiner. No new matter is submitted by these amendments. Rather, as suggested by the Examiner, the phrase "in connection the offering for sale" is corrected to read "in connection with the offering for sale".

In the Claims:

The following table summarizes the substantive rejections in the Office Action:

Claim(s)	Basis	Cited Reference
1-5, 9, 14-32	102(e)	Petchenkine et al.
6-7, 10	103(a)	Petchenkine in view of King, et al.
8	103(a)	Petchenkine in view of Tolfa
11-13	103(a)	Petchenkine in view of King, et al.

The Present Invention is Novel Over Petchenkine et al.

The present invention relates to conversion of vector graphics files to files suitable for display on a computer, such as a computer running an Internet browser. The invention is particularly well suited for producing electronic equivalents of retail catalogs such as furniture catalogs used by retailers to promote and sell their merchandise over the Internet. Furthermore, the present invention can be used to provide an in-store reprint of selected catalog pages using an inexpensive standard RGB desktop printer. This reprint capability avoids the need for reordering costly catalog reprints.

Furniture manufacturers have for years generated very carefully planned and designed catalogs to aid in the promotion and sale of their products. Catalog design has become quite

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sophisticated, with particularized placement of text and graphics on the pages being chosen by the catalog designers to achieve specialized visual effects. Among the effects desired is the overlay of one photograph over a part of another.

With the advent of the Internet and e-commerce endeavors, it is desired to replicate such catalogs on the Internet so that viewers and potential customers on the Internet will have identically the same image available to them as would be available in the printed catalog. Similarly, it may be desirable for many other types of print media to be transported to a browser-display with fidelity to the original.

The state-of-the-art in printing, particularly with respect to catalogs, but for other printed products also, involves the use of digital electronics. The image to be printed is stored in an electronic file in a vector graphics format. In vector graphics, mathematical equations and file pointers are used to collate the text and images to be printed on the printed page. These files can be processed to make the color separations needed in the printing process, according to known techniques. The patent to Petchenkine is illustrative of such techniques. Petchenkine discloses a prepress workflow with just such an objective. But, the present invention detours and bypasses the traditional prepress process by focusing on producing an Internet-ready electronic catalog as distinguished from a hardcopy print catalog. Several technical issues must be solved to do this.

First, the size of the digital files for printed catalog pages, even using vector graphics, can be on the order of 25 million bytes, too large for transmission at reasonable speeds over commonly available digital networks. Also, among the 25 million bytes of information is much more detail than can typically be displayed on a monitor used in an Internet or other browser system. Typically, browsers display information in much less resolution, such as in the jpeg or gif format, having more on the order of 25,000 bytes of information, which can be reasonably quickly transmitted over digital networks.

Second, the browsers display images according to instructions imbedded in a markup language, typically html. In html, code is written to determine the color, size, and placement of various items on a page, and such code is typically written or edited in a manual mode, although some page editor programs are now available. Nonetheless, creation of an html page or other markup language page to replicate with high fidelity the images of a printed catalog

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or other printed publication is very difficult and time consuming. Essentially, the html page must be prepared from scratch, requiring trial and error to determine how well the browser-displayed page replicates the printed page. Errors must be corrected by rewriting code.

The present invention provides a method of creating a web page from a vector graphics data file. Such a vector graphics file is typically the same type of file that is routed through a prepress operation like Petchenkine's. The method includes a sequence of steps beginning with the conversion of the vector data file from its native file format to a bit map graphics file format. The vector graphics data file can be a prepress data file created using a software application program such as QuarkXPress, Adobe Illustrator, Macromedia Freehand, and etc.

The bit map graphics file so made still cannot be displayed on a standard computer monitor, because standard computer monitors require RGB color values to properly display a color image. As a result, a next step for converting the colors of the bit map graphics file is needed. In particular, the native color value settings must be converted to RGB color values.

The next step in the sequence is the insertion of the color-modified bitmap into a web page to be displayed over the Internet. In some cases this step includes a further step of compressing the modified bitmap in order to make its Internet transfer faster. This compressing step can take place before or after the color conversion step. The compression can be accomplished by reducing the resolution of an image encoded in the file. Preferably, the file resulting from the compression conforms to an Internet format standard such as a joint photographic experts (jpeg) file or a graphics interchange format (gif) file.

While the vector graphics data file of the present application is referred to as a prepress file in the beginning step of a preferred embodiment, this reference does not imply that the method of the present invention is a prepress process. In contrast, the disclosed method leads to the creation of an Internet web page that is a different result and follows a different path than traditional prepress processes like Petchenkine's.

The primary reference, U.S. Patent No. 6,483,524 to Petchenkine et al. is an example of a traditional prepress process that is in contrast to the present invention. Petchenkine discloses a workflow for a prepress operation that uses a raster image processor. Quite different from the present invention, the outcome of the method described by Petchenkine is a

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hardcopy printed image made up of CMYK ink dots. It is not a display for a computer monitor. Petchenkine is not concerned with modifying and inserting a color image into an Internet web page such that when the web page containing the image is displayed on a standard computer monitor, the image has a faithful reproduction of the image's color. Instead, Petchenkine's disclosure of color treatment is color correction, which is different than the color conversion claimed. Petchenkine has no need to convert an image's CMYK values to RGB. In fact, such a conversion would be detrimental to the Petchenkine process because Petchenkine's process is directed towards a printing using large commercial CMYK type printers.

On the other hand, the end user of images processed using the method of the present invention can print high fidelity images on an RGB type printer. Also, since there is no color loss in converting from RGB color values to CMYK color values, an end user of the images processed by the present invention may choose to print a hardcopy using a CMYK type printer. This is but a subsidiary feature, however; the method of the present invention is not specifically directed towards hardcopy printing. Therefore, how and if to print a hardcopy of the images processed by the present invention is largely a matter of personal choice for the end user. Quite the reverse, the method described by Petchenkine is specifically directed only towards printing hard copies of processed images.

Petchenkine discloses a method of configuring a prepress workflow that includes a raster image processor (RIP) together with a graphical user interface. Petchenkine's graphical user interface includes a prepress system design palette and a raster image processor (RIP) module icon that represents a raster image processor distributed object module that is used in a prepress workflow operation.

As stated in MPEP §2131, a claim is anticipated under §102 only if each and every element as set forth in the claim, in as complete of detail, is found in a single prior art reference. The claimed invention, according to independent claim 1, includes a recitation for a step of "modifying the bitmap graphics data file by converting color values to a format that can be displayed on a computer monitor". As such, for a cited reference to be anticipatory, the reference must describe this identical element. In other words, the reference, to teach in as much detail as is claimed by the present invention, must disclose a step of converting color

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values to a format that can be displayed on a computer monitor. Moreover, independent claim 1, calls for a step of "inserting the modified bit map graphics data file into the web page". Therefore, in order to be anticipatory the primary reference would need to also disclose a step of inserting a modified bit map graphics file into a web page. Petchenkine **does not** disclose a step of converting color values to a format that can be displayed on a computer monitor. **Nor does** Petchenkine disclose a step of inserting a modified bit map graphics file into a web page.

As previously stated, Petchenkine is focused on improving a traditional prepress workflow for hardcopy printing. Petchenkine is not motivated to go beyond prior art techniques involving writing and rewriting HTML code on a trial and error basis. On the other hand, the present invention provides a method that detours the traditional prepress techniques described by Petchenkine and solves the problem of very difficult and time-consuming rewrites of HTML code as it pertains to Internet based electronic catalog design.

The Office Action pointed to column 12, lines 57-61, as disclosing HTML coding, but that reference is directed towards prior art techniques in which an HTML page must be prepared from scratch, requiring trial and error to determine how well the browser-displayed page replicates the printed page. Any errors found must be corrected by rewriting the HTML code. On the other hand, the present invention provides a modified bitmap graphics file that can be directly inserted into a web page without the trial and error process. In order to create a web page containing the modified bit map graphics file of the present invention, the steps of claim 1 must be followed in sequence. Petchenkine **does not** suggest such a sequence of steps.
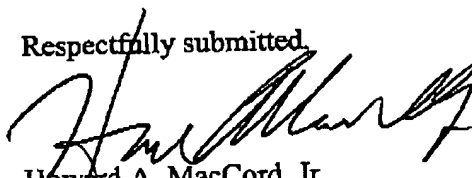
Claim 1 of the present application calls for modifying the bitmap graphics data file by converting color values to a format that can be displayed on a computer monitor. Claim 23, dependent upon claim 1, calls for a (prepress) bit map data file to be modified by converting the cyan, magenta, yellow, black (CMYK) color values of the bit map graphics data file into red, green, blue (RGB) color values.

FIG. 18 of Petchenkine depicts a setup window for setting print screen parameters for a CMYK ink printer driver. The screen angle, dot frequency and dot shape are the only parameters that can be adjusted by way of the setup window of FIG. 18 and these are all hard

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copy, CMYK printing variables. Petchenkine makes no provision for converting CMYK color values to RGB color values. In fact, Petchenkine mentions the term RGB only once in the specification (column 24, line 20), and this one and only reference teaches away from the present invention by changing color values from RGB to color, i.e., CMYK. The other references do not fill the void.

In view of the foregoing amendments and for the above reasons, it is believed that this application is now in condition for allowance. Accordingly, an early Notice of Allowance is respectfully solicited.

Respectfully submitted,

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